REMARKS

The Office Action dated April 27, 2006 has been received and carefully noted. The above amendments to the Claims, and the following remarks, are submitted as a full and complete response thereto.

The Office Action rejected claims 1-60 under 35 U.S.C. 103(a) as being obvious over US Patent No. 6,021,132 to Muller et al. (Muller), in view of US Patent No. 6,529,519 to Steiner et al. (Steiner), further in view of US Patent No. 5,860,136 to Fenner (Fenner), further in view of US Patent No, 6,614,796 to Black et al. (Black). The Office Action took the position that Muller taught all the elements of the claims 1-60, with the following exceptions of a single buffer per packet mechanism, an index key and the key being a portion of the destination address. Steiner was cited as providing the single buffer per packet mechanism, Fenner was cited as providing the index key, and Black was cited as providing the key being a predefined portion of the destination address. Applicants respectfully submit that the cited references, either alone or in combination, fail to disclose or suggest all the features of any of the presently pending claims.

Claim 1, upon which claims 2-7 are dependent, recites a memory structure. An Address Resolution Table resolves addresses in a packet-based network switch and using a key to index a location within the Address Resolution Table wherein the key is a predefined portion of a packet destination address. A Packet Storage Table, is adapted to receive a packet for storage in the packet-based network switch, and sharing a preselected

portion of memory with the Address Resolution Table. A single buffer per packet mechanism is configured to receive an individual packet for enabling only one transmit descriptor read per the individual packet and for enabling an execution of a single access in order to locate an entire packet at the location using the key. The entire packet is to be transmitted.

Claim 8, upon which claims 9-12 are dependent, recites a memory structure. An Address Resolution Table having an associative memory structure uses a key to index a location within the Address Resolution Table. The Address Resolution Table resolves addresses in a packet-based network switch. A single buffer per packet mechanism is configured to receive an individual packet for enabling only one transmit descriptor read per the individual packet and for enabling an execution of a single access in order to locate an entire packet at the location using the key. The key is a predefined portion of a packet destination address.

Claim 13, upon which claims 14-27 are dependent, recites a memory structure having a memory block. The memory structure includes an Address Resolution Table having an associative memory structure. The Address Resolution Table resolves addresses in a packet-based network switch and using a key to index a location within the Address Resolution Table. A Transmit Descriptor Table is associated with a corresponding packet-based network transmit port, and the Transmit Descriptor Table is adapted to receive a Table Descriptor Address and a Table Descriptor Value. The Packet Storage Table is adapted to receive at least one of each of a Packet Data Address portion

and a Packet Data Value portion. The memory structure also includes a single buffer per packet mechanism configured to receive an individual packet for enabling only one transmit descriptor read per the individual packet and for enabling an execution of a single access in order to locate an entire packet at the location using the key wherein the key is a predefined portion of a packet destination address.

Claim 28, upon which claims 29-31 are dependent, recites a packet-based switch. The packet-based switch includes a shared memory structure having an Address Resolution Table and a Packet Storage Table. A key indexes a location within the Address Resolution Table wherein the key is a predefined portion of a packet destination address. A single buffer per packet mechanism is configured to receive an individual packet for enabling only one transmit descriptor read per the individual packet and for enabling an execution of a single access in order to locate an entire packet at the location using the key. The entire packet is to be transmitted.

Claim 32, upon which claims 33-51 are dependent, includes some of the features of claim 13, but is drawn to a packet-based switch.

Claim 52, upon which claims 53-56 are dependent, includes some of the features of claim 8, but is drawn to a packet-based switch.

Claim 57, upon which claims 58-60 are dependent, includes some of the features of claim 8, but is drawn to a packet-based switch.

As discussed in the specification, examples of the present invention enable a memory structure to resolve addresses in a packet-based network switch. Examples of

the present invention enable bandwidth savings that are attributed to a one buffer-per-packet approach. The single buffer-per-packet approach enhances the feasibility of a bit-per-buffer pool tracking technique and the need to search a larger buffer structure can be mitigated or eliminated. Thus, a packet-based switch performs one memory read for address resolution, and one memory write for address learning, to the address table for each frame received. Overhead is reduced and a reduction in accesses per frame is achieved. The single access for both read and write can be attributed to the single-entry direct-mapped address table. Applicant respectfully submits that the cited references of Muller, Steiner and Fenner, when viewed alone or combined, fail to disclose or suggest all the elements of the presently pending claims. Therefore, the cited references fail to provide the critical and unobvious advantages discussed above.

Muller relates to shared memory management in a switch network element. Muller describes a shared memory manager 220 that is exploited by input and output ports 206 by locally storing pointers to buffers that contain packet data rather than locally storing the packet data. A predetermined number of buffer pointers are kept on hand to allow immediate storage of received packet data. The buffer pointers are preallocated during the initialization of switching element 100 and requested from shared memory manager 220. Pointers are queued to buffers that contain packet data, and not to the packet data itself. Further, a packet can be stored over more than one buffer. Each buffer in shared memory 230 is owned by one or more different ports at different points in time without having to duplicate the packet data.

Steiner relates to prioritized-buffer management for fixed size packets in a multimedia application. Steiner describes a memory system that includes a tag register for storing tags associated with respective pages, wherein each tag indicates whether the associated page is empty or full. Steiner also describes a shadow register for storing conflict-free updates from the tag register and a page register for storing pointers to the lowest free or unoccupied page. Steiner also describes a buffer that is organized along packet boundaries or pages for convenience of operation. A processor maintains a table of pointers to each packet boundary, and, therefore, knows the location of all leftover packets. A tag register 40 is provided, that has as many bits as there are packet boundaries of buffer 22.

Fenner relates to a method and apparatus for use of associated memory with large key spaces. Fenner describes an associative memory that utilizes a location addressable memory and a lookup table to generate, from a key, the address in memory storing an associated record. Fenner describes an associative memory utilizing arithmetic coding to associate a key presented to the memory with a record stored in the memory. The associative memory includes an index table stored in memory and a record memory for storing the records of data. The index table is constructed so that each symbol of a key, with a key being divided into a string of symbols and each symbol being defined by its position within the key and its value, addresses an index value in the index table memory. The index values are assigned such that the sum of index values for a given key is a unique value that is used to address the record memory.

Black is directed to transferring data through a Fibre Channel Arbitrated Loop (FCAL) switch. The FCAL switch uses multiple switch control circuits each coupled to one FCAL network, all of which are connected to a crossbar switch. The destination of each OPN is used to address a lookup table in each switch control circuit to determine if the destination node is local.

Applicants respectfully submit that the cited references, taken individually or in combination, fail to disclose or suggest all of the features of the above claims because Black fails to cure the admitted deficiencies of Muller, Steiner and Fenner, for the reasons set forth below.

Specifically, the cited combination of references fail to disclose or suggest at least the feature of an Address Resolution Table for resolving addresses in a packet-based network switch and using a key to index a location within the Address Resolution Table wherein the key is a predefined portion of a packet destination address, as recited in claims 1, 8, 13, 28, 32, 52 and 57. The Office Action alleged that Black cured these deficiencies in col. 8 lines 54-58.

Applicants respectfully submit that Black merely discloses using the destination address in the OPN primitive as a search key. Nowhere does Black disclose or suggest using a predefined portion of the destination address as a key to search a routing table, as recited in the pending claims. Thus, Black fails to cure the admitted deficiencies of Muller, Steiner and Fenner.

In the "Response to Arguments" section, the Office Action asserted that even if this feature "if not directly taught by Black, and if not reasonably implied by Black through teachings of efficiency (see Black, col. 8 lines 10-32) or through teaching a search key that is distinct from the destination address (see col. 8 lines 54-55), using a predefined portion of the destination address in Black instead of using the entire destination address would have been obvious to one of ordinary skill in the art at the time of the invention in order to conserve a variety of system resources known in the art."

Applicant respectfully disagrees for the following reasons. The cited portion of Black (col. 8 lines 54-55) does not even mention, let alone disclose or suggest, that "a search key that is distinct from the destination address" as alleged in the Office Action. Instead, the section merely discusses the use of the destination address as a search key as one embodiment of the invention ("using the destination address in the OPN primitive as a search key . . ."). Black goes no further to disclose or suggest that a "pre-defined portion" of the destination address is used as a search key. Thus, the Office Action's argument that Black implies or renders obvious that a predefined portion of the destination address is used as a search key, improperly adds features to Black that are neither reasonably implied, nor inherent to the teachings of Black.

Thus, as previously argued, not only does Black fail to cure the admitted deficiencies of Muller, Steiner and Fenner, the inclusion thereof is the result of improper hindsight reasoning and piecemeal analysis, because the only motivation to do so, is obtained from the Applicants' disclosure.

It is well-established in United States patent law that a piecemeal analysis of a number of references, to extract a number of individual elements which are picked and chosen to recreate the claimed invention, is improper absent some teaching or suggestion in the references to support their use in the particular claimed combination. It is further improper to look to the Applicant's own disclosure for any such motivation or incentive. Interconnect Planning Corporation v. Feil, 227 USPQ 543 (Fed. Cir. 1985), Symbol Technologies Inc. v. Opticon, Inc., 19 USPQ 2d. 1241 (Fed. Cir. 1991), In re Rothermel and Waddel, 125 USPQ 328 (CCPA 1960), In re Jones, 21 USPQ 2d. 1941 (Fed. Cir. 1992).

Applicants respectfully submit that there is no teaching or suggestion in the cited references to support the addition of Black to the combination of Muller, Steiner and Fenner. Thus, based at least on the above, Black fails to cure the admitted deficiencies of Muller, Steiner and Fenner. Accordingly, the cited references fail to disclose or suggest all of the features recited in claims 1, 8, 13, 28, 32, 52 and 57.

Applicants respectfully submit that because claims 2-7, 9-12, 14-27, 29-31, 33, 51, 53-56 and 58-60 depend from claims 1, 8, 13, 28, 32, 52 and 57, these claims are allowable at least for the same reasons as claims 1, 8, 13, 28, 32, 52 and 57, as well as for the additional features recited in these dependent claims.

Based at least on the above, Applicants respectfully submit that the cited references, taken individually or in combination, fail to disclose or suggest all of the

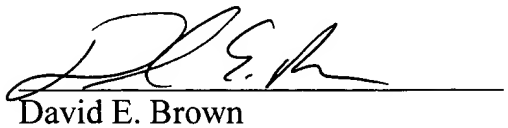
features recited in any of the above claims. Accordingly, withdrawal of the rejection of claims 1-60 under 35 U.S.C. 103(a) is respectfully requested.

Applicants respectfully submit that each of claims 1-60 recite features that are neither disclosed nor suggested in any of the cited references. Accordingly, it is respectfully requested that each of claims 1-60 be allowed and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,



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